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March 6, 2012

VIA ECF

Hon. Anne E. Thompson
United States District Judge
Clarkson S. Fisher Federal Building and United States Courthouse
402 E. State Street
Trenton, New Jersey 08608

Re: John Hoadley And Sons, Inc. v. McWane, Inc., *et al.*
Civil Action No. 12-711(AET)(LHG)

Thompson Distribution v. Sigma Corp., *et al.*
Civil Action No. 12-717 (AET)(LHG)

Water Line Supply LLC, *et al.* v. Sigma Corp., *et al.*
Civil Action No. 12-788 (AET)(LHG)

Hi Line Supply Co., Ltd. v. Sigma Corp., *et al.*
Civil Action No. 12-859(AET)(LHG)

Summit Pipe & Supply Co., Inc., *et al.* v. Sigma Corp., *et al.*
Civil Action No. 12-1331(AET)(LHG)

Dear Judge Thompson:

We are co-counsel for Plaintiffs Water Line Supply LLC and Public Works Supply Co., Inc. in Civil Action No. 12-711(AET)(LHG). All of these actions have been brought by direct purchasers of ductile iron pipe fittings ("DIPF") from Defendants, alleging that Defendants conspired to allocate markets and fix prices of DIPF in the United States contrary to the Sherman Antitrust Act.

Presently pending before the Court are three motions for the appointment of interim class counsel on behalf of direct purchasers. The first was filed by ourselves along with Grant & Eisenhofer, P.A., Labaton Sucharow LLP and Morris and Morris LLC. The second, a cross-motion, was filed by Lite DePalma Greenberg and Kaplan Fox & Kilsheimer. These two motions

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are returnable on Monday, March 12, 2012. A third motion, filed by Sterns & Weinroth and Cohen Milstein Sellers & Toll, is presently returnable on April 2, 2012.

Thus, at present, our reply papers to the Lite Depalma/Kaplan Fox motion would be due on March 12 and our responsive papers to the Sterns & Weinroth/Cohen Milstein motion would be due on March 19. In reality, however, the Sterns & Weinroth/Cohen Milstein motion is not a stand-alone motion but is opposition and a cross-motion to our original motion. Further, under the Local Civil Rules, Sterns & Weinroth and Cohen Milstein would not be entitled to file reply papers on their cross-motion.

We respectfully suggest that, in the interest of judicial economy, all of these competing motions and cross-motions be on the same track and be heard at the same time. Thus, as the original moving party, we would request that all of the motions be returnable on April 2, 2012, with our reply papers to both cross-motions being due on March 26. If that is acceptable to the Court, kindly "so order" this letter and have a "filed" copy returned to us via the Court's ECF system.

Thank you for your attention to this matter. Of course, if the Court has any questions, we are available to discuss them either in person or by telephone conference.

Respectfully submitted,

CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY & AGNELLO

/s/ James E. Cecchi

JAMES E. CECCHI

cc: All Counsel (via ECF)